

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

JERRY BAKER,

Plaintiff,

V.

RUSSELL CORPORATION,

Defendant.

Civil Action No. 3:07cv1127-WKW

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26(f), a conference was held on February 19, 2008 and was attended by:

Maricia Woodham
Sabel & Sabel, P.C.
2800 Zelda Road, Suite 100-5
Montgomery, Alabama 36106
Attorney for Plaintiff

Jay St. Clair
Bradley Arant Rose & White
1819 Fifth Avenue North
Birmingham, AL 35203-2104
Attorney for Defendant

2. Pre-Discovery Disclosures. The parties will exchange the information required by Local Rule 26 by March 30, 2008.

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

- a. Discovery will be needed on the following subjects: All of the issues and allegations raised by Plaintiff's Complaint, the defenses asserted in Defendant's answer, Plaintiff's claimed damages and the defenses thereto.
- b. Disclosure of electronically stored information should be

handled by the Parties first taking steps to maintain any electronically stored data and then producing such data as may be warranted through the course of discovery.

All discovery commenced in time to be completed by October 31, 2008.

Maximum of 45 interrogatories by each party to any other party. Responses due 30 days after service.

Maximum of 30 requests for admission by each party to any other party. Responses due 30 days after service.

Maximum of 10 depositions by plaintiff(s) and 10 by defendant(s).

Reports from retained experts under Rule 26(a)(2) due:

From plaintiff(s) by June 30, 2008.

From defendant(s) by July 30, 2008.

Supplementations under Rule 26(e) due August 15, 2008.

4. The parties do not request a scheduling conference with the Court before entry of the scheduling order.

5. The parties request a pretrial conference in November 2008.

6. Plaintiff should be allowed until May 31, 2008 to join additional parties and amend the pleadings.

7. Defendants should be allowed until June 30, 2008 to join additional parties and amend the pleadings.

8. All potentially dispositive motions should be filed by September 30, 2008.

9. Settlement cannot be evaluated prior to some initial discovery.

10. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

From plaintiff(s): 21 days prior to trial;

From defendant(s): 21 days prior to trial.

11. Parties should have 14 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

12. The case should be ready for trial by January 31, 2009, which at this time is expected to take approximately 3-4 days.

Date: February 19, 2008.

s/Jay St. Clair

Jay St. Clair

Attorney for Defendant

Russell Corporation

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s/Maricia Woodham

Maricia Woodham

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